

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Numbering Resource Optimization)	CC Docket No. 99-200

**COMMENTS OF
THE PUBLIC UTILITIES COMMISSION OF OHIO**

INTRODUCTION

The Public Utilities Commission of Ohio makes this electronic filing because its paper comments, received by the FCC on November 6, 2001¹, have not yet been posted to the web. In an effort to give all commenters and the FCC the benefit of accessing all of the comments in this docket on the FCC's website, Ohio submits its comments electronically.

On October 17, 2001, the FCC released a Public Notice, requesting comments on its proposed national thousands-block number pooling rollout schedule. The initial focus will be on NPAs in the top 100 Metropolitan Statistical Areas (MSAs), with a special emphasis on jeopardy NPAs that are within the largest 100 MSAs. All of the Ohio

¹ Federal Express records indicate that the Ohio Commission's comments were received on November 6, 2001.

MSAs fall within this list, including: Cincinnati, Cleveland, Akron, Toledo, and Columbus.

The FCC has requested comments on its proposed rollout schedule. The FCC will consider requests from states to rearrange the order of the NPAs listed in the rollout schedule.

The PUCO believes that the proposed schedule must be altered in order to promote the most efficient use of numbers in Ohio. Because the PUCO obtains more updated and accurate numbering information, it recommends changes/substitutions to the dates that the FCC has proposed. The recommendations made by the PUCO are strictly substitutions and do not affect the total number of NPAs that will implement thousands-block pooling in a single quarter.

DISCUSSION

The PUCO recommends that the order in which national pooling is scheduled for the Ohio NPAs be changed. The PUCO believes that the FCC's intent of nationwide pooling is to ultimately delay the issuance of any new NPAs. For pooling to be most effective in Ohio, pooling should occur first in the Ohio NPAs that either do not have an overlay NPA in effect or do not have an overlay NPA assigned to go into effect within the next year. Such NPAs would be the 440 NPA (Cleveland, Lorain, Elyria), the 216 NPA (Cleveland), the 740 NPA (Columbus), and the 937 NPA (Dayton, Springfield).

Currently, the 513 NPA is scheduled for the first quarter of the national rollout solely due to the fact that it is technically in jeopardy. However, the PUCO is quick to

point out a number of factors: not long after being placed in jeopardy, the 513 NPA received over 100 protected codes from Kentucky; an overlay NPA, 283, will go into effect July 29, 2002; through the end of September, 2001, 171 NXX codes were still available; an average of 4.08 codes were assigned per month in the past year; and, based on this historical information, exhaust of the 513 NPA possibly would not occur for another 34 months. Based on all of these factors, the PUCO recommends that the FCC disregard the jeopardy status of the 513 NPA and move the 513 NPA to the 5th quarter slot currently listed for the 740 NPA.

The PUCO additionally recommends that the 440 NPA be moved to the first quarter slot currently held by the 513 NPA. The latest projected exhaust forecast for the 440 NPA has the NPA exhausting in the second quarter of 2004. As of the end of September 2001, the 440 NPA has 247 NXX codes available. The current assignment of codes has been averaging less than 5 codes per month, with requests for codes in the last three months averaging less than three per month. This information leads the PUCO to believe that the next projected exhaust forecast for 440 will extend its life even further than previously forecasted. If pooling were implemented in the 440 NPA during the first quarter of the rollout, the need for area code relief would almost certainly be delayed for an even more extended period of time.

The same is true for the 216 NPA (Cleveland). As of September 2001, 283 NXX codes were available in the 216 NPA. The average assignment of codes for the past nine months was 2.5 codes per month. Although the most recent forecast projects that the 216 NPA will exhaust in the third quarter of 2005, due to the low rate of assigned NXX

codes, the PUCO believes that the exhaust date for the 216 NPA will be extended. The PUCO notes that this NPA has already gone through two geographic splits in the past six years. Any method to delay area code relief for the consumers in the 216 NPA should be used. Therefore, the PUCO recommends that the 216 NPA be moved to the third quarter slot currently held by the 440 NPA.

In order to move the 513 NPA to the fifth quarter slot of the 740 NPA, the 740 NPA would need to be moved to the fourth quarter position held by the 216 NPA. The PUCO acknowledges that it has not made a recommendation to move the remaining NPA with no overlay, the 937 NPA, in the proposed schedule. We believe that, with 213 available codes and an average of 8.7 codes assigned per month, earlier pooling in the 937 NPA would still not delay the need for the PUCO to open an area code relief case for that NPA in the spring of 2002.

CONCLUSION

The PUCO recommends that the FCC rearrange the order in which Ohio NPAs would implement thousands-block pooling. Following is the PUCO's recommended schedule:

First quarter - **440** (Cleveland, Lorain, Elyria)

Third quarter - **216** (Cleveland)

Fourth quarter - **740** (Columbus)

Fourth quarter- 330/234 (Akron)

Fourth quarter- 419-567 (Toledo)

Fifth quarter- **513/283** (Cincinnati)

Fifth quarter- 614/380 (Columbus)

Fifth quarter- 937 (Dayton, Springfield).

Respectfully Submitted,

**On Behalf of the Public Utilities
Commission of Ohio**

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Dated: November 5, 2001